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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of: Scott J. Clifford et al.	)	
	)	Group Art Unit: 1734
Serial No.: 10/691,763	)	
	)	Examiner: G. Koch
Filed: October 23, 2003	)	
	)	Attorney Docket: 132815-7
For: Modular Painting Apparatus	)	(formerly 16129)

Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

DECLARATION OF DOUGLAS A. FRANK UNDER 37 CFR 1.132

Honorable Sir:

Douglas A. Frank declares as follows:

1. I received a Bachelor of Science degree in Mechanical Engineering in 1969 from General Motors Institute (now Kettering University) and a Masters of Business Administration Degree in 1980 from Oakland University.

2. From 1982 to date, I have been employed by Fanuc Robotics America, Inc., Rochester Hills, Michigan, assignee of the above application. My present position is Regional Sales Manager, Paint Systems Automation Group.

3. I have reviewed the declaration document, dated July 17, 2007 of Scott Clifford and Paul Copioli, inventors of the above identified patent application.

4. I can attest to the market impact this machine has had to the industry and in particular to my key customers including General Motors and BMW Manufacturing Co., LLC.

5. For General Motors, the success of this new innovation is evidenced by the increased sales of this application to plants in North America. This P-500 product has allowed General Motors to reduce the size of booths previously required and provided sales opportunities that previously were not available.

6. Previous to the P-500 product, General Motors had specified the use of a competitor's fixed bells for application of paint such as clear coat. Thus, the P-500 opened up the market for this application.

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7. General Motors personnel from their Global Paint Engineering group located in Warren, MI, have expressed their congratulations on the success of this innovation that they say "reduced the cost of this paint application by 50%."

8. General Motors personnel have also acknowledged that the innovative application has allowed a reduction in paint use and an increase in product uniformity not previously available.

9. General Motors and its affiliates have purchased (CAMI, Fairfax, SLP, Toluca) units as a result of this innovation.

10. BMW Manufacturing Co., LLC, located in Spartanburg, S.C., is now seriously considering use of this P-500 solution for a new plant expansion planned for the Spartanburg plant. This consideration would not have been even part of their normal business decision process except for the realization of capital and operating cost savings from the P-500 product.

11. BMW Manufacturing Co., LLC, said that only FANUC Robotics displayed new innovations for BMW review during their review of equipment in the US this year.

12. BMW Manufacturing Co., LLC, told FANUC Robotics that they changed their plant layouts due to the innovation brought to them by FANUC Robotics America.

13. I further declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code, and that such willful false statements may jeopardize the validity of the above-referenced application or any patent issuing thereon.

Date: July 18, 2007

By _____
DOUGLAS A. FRANK

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